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6 IN PRO PER

7 UNITED STATES DISTRICT COURT  
8 CENTRAL DISTRICT OF CALIFORNIA

11 TAYLOR THOMSON,

12 Plaintiff and Counterclaim  
13 Defendant

14 vs.

15 ASHLEY RICHARDSON,

16 Defendant and Counterclaim  
17 Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY  
RICHARDSON IN OPPOSITION TO  
PLAINTIFF TAYLOR THOMSON'S  
MOTION FOR PROTECTIVE ORDER

20 **DECLARATION OF ASHLEY RICHARDSON (EX PARTE & MERITS)**

22 I, Ashley Richardson, declare:

- 23 1. I am the Defendant, proceeding pro se. I have personal knowledge of the facts stated and  
could testify competently to them.
- 24 2. I have never disclosed to anyone any materials obtained from discovery in this case. Any  
statements I made publicly were based solely on my own lived experience or materials  
obtained prior to and outside of this litigation.
- 25 3. As of October 15, 2025, Plaintiff had not produced core internal communications I  
requested (including text messages and emails with: Madeleine Thomson, Cameron

28 DECLARATION OF ASHLEY RICHARDSON IN OPPPOSITION TO PLAINTIFF TAYLOR THOMSON'S  
MOTION FOR PROTECTIVE ORDER -

1 Moulène, Kevin Fitzgerald, Robert Sabella, Hazel Williams Carter, Shiro Gutzie, Ron  
2 Murphy, and Leigh Wang, as well as group-chat messages and the Dec. 2020–present  
3 disparagement window). Plaintiff’s October 15 production did not contain those  
categories.

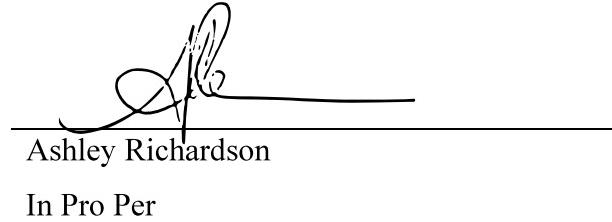
- 4 4. I have consistently asked to schedule both depositions promptly and back-to-back at a  
neutral, non-residential location, and I have attempted to meet and confer in good faith  
since the Court’s October 10 order.

6  
7 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
8 and correct.

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10  
11 Respectfully submitted,

12  
13 Ashley Richardson

14  
15 Dated October 24, 2025.



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18 Ashley Richardson  
19 In Pro Per  
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28 DECLARATION OF ASHLEY RICHARDSON IN OPPOSITION TO PLAINTIFF TAYLOR THOMSON’S  
MOTION FOR PROTECTIVE ORDER -